WORK PLAN AMENDMENT

1.0 INTRODUCTION

1.1. GENERAL

The following is an Amendment to the Work Plan that describes those activities that are being conducted to address the presence of mixed PCBs and characteristic hazardous wastes in the excavated soils and the containment of on-site soils within the central processing area at the Site as shown on **Amendment Exhibit 1**. The Group will be treating the excavated soils for VOCs and lead, as appropriate, and disposing of the stockpiles according to their remaining TSCA profile. This Amendment necessarily impacts the following sections of the Work Plan: Section 4.0 - Excavation Activities, Section 5.0 - Removal Action Closeout activities, and Section 7.0 - Project Schedule.

2.0 AMENDMENTS

2.1. EXCAVATION ACTIVITIES - SOIL TREATMENT

The soils from the excavation activities completed at the site have been stockpiled. Initial disposal samples collected from the stockpiles demonstrated that stockpiles #2 through #6 had analytical results of VOCs above TCLP levels and PCBs above TSCA disposal thresholds. Stockpile 2 also had TCLP levels of lead above the RCRA disposal threshold. Stockpile #1 had neither VOCs nor PCBs and has already been properly disposed of off-site. Stockpile #7 contained no VOCs above TCLP levels, but did contain PCBs. See **Table 1**.

Based upon updated sampling, as shown in **Table 2**, Stockpiles 2, 4 and 5C will be treated, as necessary, for VOC components using chemical oxidation, as described below. Stockpile 2 will also undergo lead stabilization prior to disposal, as described below. It is estimated that approximately 1000 tons (700 cubic yards (yd^3)) of soil will undergo chemical oxidation and/or lead stabilization. Soils with VOCs and lead below the TCLP levels for those constituents, including both treated materials and the remaining stockpiles on-site, will be shipped off-site in accordance with Work Plan Section 3.6.6 to a TSCA approved landfill. The stockpiles are currently underlain by plastic. Loading of the stockpiles for treatment and disposal will include some limited scraping of soils underlying the plastic, as is customary. No further excavation of on-site soils will be conducted. Further soil sampling will be limited to sampling of treated, stockpiled soils to confirm the adequacy of their treatment, as described in sections 2.1.1 and 2.1.2, below.

2.1.1 Chemical Oxidation

The chemical oxidation treatment process will take place within four mix boxes of 40 yd^3 capacity each. For each batch, 25 yd^3 of soil will be loaded into each mix box for processing. The oxidizing reagent (potassium permanganate) will be added to each batch of soils simultaneously with water, the soils will be mixed, and then the 4 soil batches will be staged into a single covered stockpile on plastic for overnight reaction. Processing time within the mix boxes for each batch is estimated at two and one-half hours. Following

overnight reaction time, samples will be collected from the staging piles for TCLP analysis for all RCRA TCLP VOCs. Analysis of the samples is estimated to be complete within 3-4 days. Following confirmation of treatment to below applicable TCLP levels, the soils will be loaded for disposal. Appropriate measures will be taken to control material during the transfer process for treatment. During the various soil loading processes, a fine water mist will be used, as necessary, to control dust. During the chemical addition and mixing processes, the addition of water will be necessary to facilitate oxidation, so the soils will be kept moist.

2.1.2 - Lead Stabilization

The lead stabilization process will be conducted in place at the location of Stockpile #2. A reagent, Enviroblend, a mixture of magnesium oxide and calcium phosphates, will be added to the pile and mixed in as it is added. A fine water mist will be directed onto the stockpile during the addition of the reagent. Following thorough mixing, samples will be collected and analyzed for TCLP lead. Analysis of the samples is estimated to be complete within 3-4 days. Following confirmation of adequate stabilization, the soils will be treated for VOCs via chemical oxidation, as described in section 2.1.1., above.

2.2. PROJECT SCHEDULE FOR SOIL TREATMENT

Treatment of the soil has begun. The on-site treatment and off-site shipment of the soils and backfilling of the site is anticipated to continue for approximately eight (8) weeks, assuming that once through treatment of the stockpiled soils will be adequate and that weather conditions will be amenable to the treatment technology. The need for further treatment or poor weather conditions may extend this schedule. Please note that this project timeline is based on an assumed waste shipment rate of 250 tons per day (10 trucks each with 25 tons). The availability of approved waste hauling vehicles and the ability to schedule and load those vehicles on a consistent basis throughout the project has the ability to affect the project timeline.

2.3. REMOVAL ACTION CLOSEOUT - CAP INSTALLATION

EPA intends to issue a Unilateral Administrative Order to pursue certain recalcitrant parties for construction of a cap and implementation of a cap operations and maintenance ("O&M") plan at the Site. EPA will utilize its enforcement authorities under that Order to assure performance of the required cap construction and O&M activities. However, EPA retains its enforcement discretion in all matters involving removal actions at the Site. The PRP Group will not be relieved of such responsibility, and in the event the other parties fail to perform some or all of the cap construction and O&M plan, EPA may seek to hold the PRP Group responsible for any outstanding cap obligations.

A notice of completion of work will be issued by the OSC following completion of construction of the cap and approval of the O&M plan.